

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

ANTHONY PARKS

Case No. 3:25-mj-00173

Defendant(s)

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2023 to July 2024 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section

18 USC s. 371

Offense Description

conspiracy to violate the laws of the United States – namely, theft or receipt of stolen United States mail

18 U.S.C. 1349

conspiracy to commit bank fraud

18 U.S.C. 2114

robbery of U.S. Letter carrier

This criminal complaint is based on these facts:

See Attached Affidavit of Joseph Rossiter

☒ Continued on the attached sheet.

Joseph Rossiter
 Complainant's signature

Joseph Rossiter, U.S. Postal Inspector
 Printed name and title

Sworn to by reliable electronic means -- namely, telephone.

Date: 4/9/25City and state: Dayton, Ohio

Peter B. Silvain, Jr.
 United States Magistrate Judge



AFFIDAVIT

I, JOSEPH ROSSITER, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a United States Postal Inspector, having been so employed since May 2016. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the Postal Inspection Service with investigative responsibility for southeast Indiana, and southern Ohio. Your Affiant completed United States Postal Inspection Service Basic Training in May 2016. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, since May 2016 I have worked with various federal, state and local law enforcement agencies in the prosecution of crimes involving the U.S. Mail and the U.S. Postal Service including but not limited to mail theft, burglaries, robberies, homicides, and mailed narcotics.

2. I am charged with the duty of enforcing among other Titles, Title 18 and Title 21 of the United States Code, together with other assigned duties as imposed by federal law. This Affidavit is submitted in support of criminal a complaint, and seeks the issuance of an arrest warrant against, Anthony PARKS, for violations of 18 U.S.C. § 371 (conspiracy to violate the laws of the United States – namely, theft or receipt of stolen United States mail), 18 U.S.C. § 1349 (Conspiracy to Commit Bank Fraud), and 18 U.S.C. § 2114 (Robbery of U.S. Property via Dangerous Weapon). The information contained in this Affidavit is largely based upon an

investigation conducted by me and other law enforcement officers. All of the details of the investigation are not included in this Affidavit, rather only information necessary to establish probable cause of the above-described violations.

FACTS SUPPORTING PROBABLE CAUSE

A. Introduction

3. As detailed more fully below, the United States Postal Inspection Service has developed information that Anthony PARKS and others worked together to rob United States Post Service Letter carriers of their route keys (also known as an arrow key). Route or arrow keys provide access to, among other things, U.S. Postal Service collection boxes. After obtaining an arrow key by force, PARKS and other individuals then used it to improperly access these collection boxes and remove from them United States mail. PARKS and his accomplices searched this now stolen mail for checks, which they then altered. PARKS then caused other individuals to present these fraudulently altered checks to various federal insurance financial institution for deposit or cashing.

B. Law Enforcement Discover PARKS and Kyon REESE in Possession of Indicia of Mail Theft

4. On November 26, 2022, at approximately 12:43 P.M., near 2239 Ravenwood Ave, Dayton, Ohio, a United States Postal Service (USPS) Letter Carrier was delivering mail on foot when he was approached by an unknown black male. The unknown black male displayed a firearm and demanded the USPS Letter Carrier's route keys. The USPS Letter Carrier complied and surrendered his route key to the suspect. The suspect ran to a waiting vehicle and fled the area.

5. On or about March 31, 2023, Oakwood Police Department conducted a traffic stop of a 2013 Chevrolet Malibu for improper display of a license plate. Two young men -- Kyon Reese and Anthony PARKS – occupied the vehicle. During the stop, PARKS provided officers consent to search the Malibu. Searching the vehicle pursuant to the consent, officers discovered inside of it stolen United States mail. PARKS and Reese were placed under arrest, and a cellular telephone was recovered from Reese. As part of routine booking procedures, officers inspected the protective case in which Reese’s cellular telephone was kept; officers discovered a USPS arrow key hidden between the case and the cellular telephone. USPS arrows keys have serial numbers on them; the serial number of the arrow key recovered from Reese’s phone case matched the serial number of the arrow key taken from the November 2022 Ravenwood robbery.

C. PARKS Participates in the Robbery of Letter Carrier as Confirmed Through, Among Other Things, Images from the Incident, His Statements to Others, and Social Media Posts

6. On October 14, 2023, at approximately 2:08 P.M., a USPS letter carrier was delivering mail on foot near 4647 Merrick Drive, Dayton, Ohio when three unknown males approached him (hereinafter “Merrick robbery”). One suspect displayed a firearm, put the gun to the USPS letter carrier’s chest and stated: “Give me the keys or I’ll pop you!”, or similar words. The USPS letter carrier complied and gave the suspect his USPS arrow key as well as the key to his delivery truck. After taking the keys, the suspects fled east on foot and turned south out of sight of the USPS letter carrier.

a. Postal inspectors interviewed the USPS letter carrier that same date. The USPS letter carrier advised that, after he was robbed, he placed a phone call to his supervisor and

then contacted 911. The carrier described the robbery suspects as follows: (a) Suspect 1 was approximately 6'1-6"2, and 17-20 years old; (b) Suspect 2 was approximately 5'10", approximately 150 pounds, approximately 17-20 years old, and was wearing black pants with gold stripes; and Suspect 3 was approximately 5'8" and approximately 140 pounds.

7. On October 17, 2023, after canvassing the area of the Merrick robbery, law enforcement obtained video surveillance footage of two robbery suspects just prior to their interactions with the USPS Letter Carrier on October 14, 2023. The video captures two black males: one wearing what appears to be all black and a white "COVID" style mask; and the other wearing a grey hooded sweatshirt with a distinctive yellow spot on the right side of the hood and another distinctive blue or purple marking on the left side of the hood and on the sleeve of the hooded sweatshirt, black pants with a gold-stripes, and a dark colored "COVID" style mask. *See* Figures 1 and 2 Below.



Figure 1



Figure 2

8. Law enforcement reviewed Ohio Law Enforcement Gateway (OHLEG) information concerning Anthony PARKS (who, as detailed above, was caught with stolen mail during March 2023). According to OHLEG, PARKS is a black male who stands approximately 5'11, weighs 116 pounds, and is 18 years old. Law enforcement also reviewed Parks' driver license photograph from the Ohio Bureau of Motor Vehicles ("BMV") taken on or about February 9, 2023. In that picture, Parks is wearing a hoodie that matches that worn by one of the suspects involved in the Merrick robbery. The driver license photograph is depicted below. See Figure 3 below.



Figure 3

9. On October 20, 2023, Postal Inspectors conducted a telephonic interview with a person (hereinafter “Individual 1”) who contacted the USPS and stated they had information about the Merrick robbery. (This call came after USPS released to local news organizations wanted posters depicting stills from the Merrick robbery, including of PARKS in his distinctive shirt). Individual 1 stated that they recognized one of the individuals depicted in the wanted stills – namely, a person Individual 1 knew as “Ant” who lived at 1811 Coretta Ct, Dayton, Ohio. Individual 1 advised that “Ant’s” first name was “Anthony.” According to an OHLEG search, Anthony Parks lists 1811 Coretta Ct, Dayton, Ohio as the address on his driver license. Also, when arrested with stolen mail in Oakwood, Ohio, during March 2023, Parks provided his address as 1811 Coretta Ct, Dayton, Ohio. Individual I provided this information voluntarily to law enforcement. Given that law enforcement confirmed portions of the information from Individual I, I considered Individual 1 to be truthful and reliable.

10. On October 26, 2023, Postal Inspectors again conducted a telephonic interview with Individual 1. Individual 1 stated they had recently seen “Ant” and that “Ant” had shaved off his dreads. According to Individual 1, “Ant” explained that he had cut his hair because “something was catching up to him.” Based on my training and experience, I believe that, in this conversation, PARKS explained that he had altered his appearance to avoid police linking him to the robbery of the letter carrier.

11. As detailed more fully below, Postal Inspectors learned that PARKS used two Instagram accounts – namely, ‘paidforeverap’ and ‘foreverapaidap’ – to communicate with Reese and others. During February 2025, I executed a federal search warrant on PARKS’s Instagram accounts and received information in them from July 2023 to July 2024. As detailed more fully below, I have reviewed that information and confirmed the following:

a. Through several chats, posts, or discussions contained in the accounts, the user of the account: identified himself as ‘Anthony’ and ‘AP’; listed his address as 1811 Coretta Ct, Dayton, OH 45417; posted photographs of the person that I have come to know through this investigation as Anthony PARKS; and posted photographs as well as screenshots showing Personally Identifiable Information (PII) concerning ‘Anthony Parks’ with a home address of ‘1811 Coretta Ct, Dayton, OH 45417.’ During this investigation, I have conducted surveillance at 1811 Corretta and observed PARKS there. During the Oakwood traffic stopped described, PARKS provided 1811 Corretta as his address. Law enforcement databases also list 1811 Corretta as PARKS’s home address. Given the totality of this information, I believe that PARKS was the user of the Instragram account ‘paidforeverap’ and ‘foreverapaidap’.

b. PARKS used these accounts to engage in a variety of criminal activity, including to sell THC products, to facilitate the theft of mail, to cause the cashing of fraudulently altered checks, and to coordinate the robbery of letter carriers.

12. Most notably, PARKS' Instagram account contained multiple discussions in which he and others plan the robbery of letter carriers as well as discussions from the fallout of their October 14, 2023, robbery of the letter carrier on Merrick. For instance:

a. During posts, chats or discussions spanning July 2023 through September 2023, PARKS engaged in multiple discussions with others concerning the need to acquire one or more firearms to facilitate a planned robbery of letter carriers.

(1) On or about July 17, 2023, PARKS and Reese engaged in exchange over Instagram in which Reese stated: "I'm finna take the next mail man up top". Parks replied: "damn near just got too". Reese responded: "We damnear gotta mask up cuz". Parks agreed, stating: "on the quick side". Based on my training and experience, as well as knowledge of this case, I believe that Reese indicated that he and PARKS need to rob the next letter carrier that they encountered. When PARKS agreed, Reese explained that they would need to wear masks during the robbery. That same day, PARKS and Reese participated in an additional conversation in which they contemplated paying someone else to commit the robbery. The conversation then shifted, and Reese inquired if PARKS still "got chop", a slang term for an AK-47 style rifle. PARKS confirmed that he still had that weapon. (Notably, PARKS' Instagram account contained pictures of an AK-47). Reese also indicated that he and PARKS needed to acquire two Glocks. I believe that these discussions reflect the intentions of

PARKS and Reese to arm themselves for the planned robbery.

(2) On or about September 19, 2023, PARKS engaged in an exchange with another person in which he (PARKS) asked: “Send me flick of dat gg”. After requesting this picture of a Glock handgun, PARKS explained: “I damn near need to use dat for dat mail man jugg”. The individual to whom PARKS was conversing then sent a video of a Glock handgun. Based on my training and experience, as well as knowledge of this case, I believe that PARKS requested a Glock to facilitate this planned robbery of a letter carrier.

(3) On or about September 28, 2023, PARKS received a video from another user that captured a letter carrier walking down the street with a voiceover stating “he got the key”. PARKS responded: “Cuz go tackle dat n****”. Based on my training and experience, as well as my familiarity with this investigation, I believe that an unknown accomplice was scouting a potential robbery victim. PARKS encouraged the unknown accomplice to rob the letter carrier at that time.

(4) On or about October 19, 2023, PARKS received from another Instagram user the screenshot depicted below as Figure 4. The screenshot depicted the WLWT News Channel 5 article concerning the October 14, 2023, Merrick robbery and contained a picture of PARKS in his distinctive sweatshirt. The user who sent the screenshot also included a single word message to PARKS: “hott”. I believe that this Instagram user recognized PARKS as the assailant and forwarded the news article to PARKS to warn him that he was likely to be identified by police. PARKS responded: “Who sent you dat ... I mean who posted dat”. Notably, PARKS did not deny the user’s accusation that PARKS had committed the robbery.



Figure 4

(5) On or about October 20, 2023, PARKS and Reese engaged in exchange concerning the keys that they robbed from the letter carrier during the Merrick robbery. Reese contacted PARKS, stating: “Aye that other key is 2 the truck whole time”. PARKS responded: “Wowwwwww”. Based on my knowledge of this case, I know that the assailants during the Merrick robbery took from the letter carrier two sets of keys: one to his postal vehicle and the other an arrow key. During this exchange, PARKS and Reese realize the purpose of the second key that they robbed from the letter carrier.

(6) On or about October 26, 2023, PARKS sent a message to another Instagram user: “I’m in some deep shit I wish I could tell you rn I swear you gon understand

when I can tell you tho”. Notably, this conversation occurred around the same time that Individual I learned that PARKS had cut off his dreadlocks in an effort to change his appearance. Based on the totality of the circumstances, I believe that, through this message, PARKS confirmed that he participated in the now highly publicized Merrick robbery and was concerned that law enforcement had identified him as a participant in it.

13. Around this time, an individual purporting to represent PARKS contacted a federal officer and inquired concerning the status of any federal investigation against PARKS. This individual explained that PARKS recently had relocated from the state of Ohio. Based on my training and experience, I know that, when an individual such as PARKS believes that law enforcement may soon arrest him for his participation in a crime, he will flee the state. PARKS activities following the Merrick robbery fits that pattern.

14. Based on a totality of the circumstances described above, I believe that PARKS participated in the armed robbery of the letter carrier on Merrick during October 2023.

D. Following the Robbery, PARKS and Reese Use the Arrow Key to Steal Checks from Collection Boxes and Then Cause these Stolen Checks to Be Fraudulently Deposited at Federally Insured Financial Institutions.

15. As detailed in PARKS’ Instagram accounts, he, Reese and others proceeded to use the arrow key that they stole during the robbery to illegally access collection boxes. PARKS, Reese, and others then sorted checks from this stolen mail, falsely altered these instruments, and then caused other individuals to fraudulent cash them at various federally insured financial institutions. PARKS and Reese then split the proceeds from the illegally cashed check.

16. For instance, on or about March 7, 2024, PARKS and Reese engaged an exchange over Instagram. PARKS asked Reese: “how old them hunts gotta be”. Reese responded: “30 days” . . . “if they walk in” . . . “Still next day”. Based on my training and experience, I believe that PARKS inquired how long someone had to wait to deposit a fraudulent check in a newly opened Huntington Bank account. Reese explained that they had to wait thirty days to make a deposit and, even then, they had to wait until the next day to withdraw the funds. I know that Huntington Bank is federally insured financial institution.

17. On or about March 12, 2024, PARKS and Reese engaged in another exchange over Instagram during which they discussed plans to cash a stolen check obtained from the U.S. Mail at Bank of America. I know that Bank of America is a federally insured financial institution. During this exchange, Reese explained that he had tried to use the stolen mail key, but it no longer worked on new locks affixed to collection boxes. Reese indicated that he had obtained a stolen check from the mail by “fishing” (i.e., lowering a device into the collection box and sweeping up the mail). PARKS explained that he would obtain a new ATM/debit card from Bank of America so that he and Reese could deposit the stolen check themselves and then withdraw the money shortly thereafter.

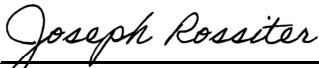
18. On or about March 21, 2024, PARKS and Reese engaged in exchange in which they discussed working together to cash an altered check drawn on the PNC business account of a company identified herein as Business A. Reese, in fact, sent PARKS a picture of the check. It should be noted that, during a search of Reese’s residence in Dayton, Ohio, during April 2024, law

enforcement recovered like and similar altered checks purported to be drawn on Business A's PNC bank account. I know that PNC is a federally insured financial institution.

19. On or about April 5, 2024, PARKS engaged in a discussion over Instagram with another individual, asking this individual to cash a stolen and altered check drawn on the bank account of a person identified herein by the initials R.E. Law enforcement has contacted R.E. who confirmed around that time, she had placed in a U.S. Postal Collection Box mail containing checks made out to "Trotwood Utilities Department" and "Credit One" in the amounts of \$51.54 and \$31.00, respectively. Law enforcement ultimately discovered that someone cashed altered versions of these checks (i.e., manipulated amounts and payees) at Huntington Bank and JP Morgan Chase. I know that both of these banks are federally insured

20. During April 2024 and again during July 2024, law enforcement executed search warrants at Reese's residence in Dayton, Ohio, and discovered their evidence that he was engaged in altering and cashing stolen checks. After each search, PARKS engaged in Instagram exchanges with Reese and others in which he expressed concern that he was about to be implicated in this scheme. Most notably, after the July 2024 search warrant, PARKS asked Reese's sister if the search had concerned his case with Reese (i.e., the robbery and ensuing fraud scheme) or something new.

21. Based on the foregoing, there is probable cause to issue the above-requested criminal complaint and arrest warrant for PARKS.



Joseph Rossiter
Postal Inspector
United States Postal Inspection Service

Subscribed and sworn to before me on 9th April, 2025.



Peter B. Silvain, Jr.
United States Magistrate Judge

